

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

PRESIDENT DONALD J. TRUMP,  
an individual, and REPRESENTATIVE  
RONNY JACKSON, an individual,

Plaintiffs,

v.

PARAMOUNT GLOBAL d/b/a  
PARAMOUNT, a Delaware  
corporation, CBS BROADCASTING  
INC., a New York corporation, and CBS  
INTERACTIVE, INC., a Delaware  
corporation,

Defendants.

Case 2:24-CV-00236-Z

**CONSENT MOTION FOR AN EXTENSION OF UPCOMING  
DEADLINES**

Plaintiffs, President Donald J. Trump and Representative Ronny Jackson (“Plaintiffs”), together with Defendants Paramount Global d/b/a Paramount, CBS Broadcasting Inc., and CBS Interactive, Inc. (“Defendants”) (together, the “Parties”), respectfully request that the Court grant an extension of upcoming deadlines in the above-captioned case, as set forth in the table below.

The Parties respectfully submit that good cause to extend the deadlines set forth in the table below exists because the Parties are engaged in active settlement discussions, including continued mediation.

Description	Current Deadline	Proposed New Deadline
Plaintiffs' deadline to file response to Defendants' Motion to Compel	June 16, 2025	June 30, 2025
Defendants' deadline to file a reply to Plaintiffs' response to Defendants' Motion to Compel	June 23, 2025	July 7, 2025
Plaintiffs' deadline to file a Motion to Compel	June 30, 2025	July 14, 2025

Plaintiffs further respectfully request, together with Defendants, that, if Plaintiffs file a motion to compel, Defendants' response shall be due July 28, 2025. In the interim, the Parties will continue to meet and confer to try to narrow the scope of any issues. The Parties are not seeking to extend any deadlines regarding the pending motions to dismiss, and Defendants intend to file their reply on or before June 23, 2025. Nor are the Parties seeking to extend any other deadlines in the Court's Scheduling Order.

Plaintiffs' counsel has conferred with counsel for Defendants, and all Parties have consented to this motion in writing.

Respectfully submitted,

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*Counsel for Plaintiffs, President Donald J. Trump  
and Representative Ronny Jackson*

**CERTIFICATE OF CONFERENCE**

I certify that on the 13<sup>th</sup> day of June, 2025 I conferred with attorney Elizabeth McNamara, counsel for Defendants. Ms. McNamara stated that she is in agreement with this Motion.

/s/ Edward Andrew Paltzik  
Edward Andrew Paltzik

**CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing document was served pursuant to the Federal Rules of Civil Procedure on the 13<sup>th</sup> day of June, 2025, via the Northern District of Texas's electronic filing notification system.

/s/ Chris D. Parker  
Chris D. Parker